# Salt Mobile SA Supplier Code of Conduct



# Document Version

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# Purpose

Salt Mobile SA ("Salt") is a Swiss based provider of telecommunication solutions, offering its services to customers across Switzerland and Liechtenstein (via Salt (Liechtenstein) AG subsidiary, under 7acht brand name). Salt aims to support responsible and sustainable value creation throughout its range of services. The company is committed to conducting business with integrity, transparency, and in an ethical manner. This commitment extends to relationships with suppliers, as Salt recognizes that suppliers play a crucial role in contributing to its success and maintaining its reputation. This Supplier Code of Conduct ("this Code of Conduct") outlines the standards and expectations Salt has for its suppliers to ensure alignment with its ethical business principles. It sets out the minimum standards suppliers are expected to meet and serves as a prerequisite for selection. For selected suppliers, the Code of Conduct becomes an integral part of the contractual agreement either through a Salt purchase order and its associated "Standard terms and conditions for the supply of services, goods, installations and maintenance" or a mutually signed agreement.

# Scope

This Code of Conduct applies to all Suppliers and is relevant to all areas in which they are directly involved.

Suppliers are expected to implement this Code of Conduct across all operations, regardless of local practices or standards. Deviations from these principles are not permitted, even in contexts where different norms may be customary or widely accepted.

Suppliers are responsible for ensuring that the principles and requirements outlined in this Code of Conduct are also communicated to and upheld by their subcontractors and other third parties involved.

In the event of any contradiction between this Code of Conduct and the main agreement, the provisions of the main agreement shall prevail.

# 1. Compliance with Laws and Regulations

#### 1.1 General

Suppliers must comply with all applicable local, national, and international laws and regulations in the jurisdictions where they operate. This includes, but is not limited to, laws related to human rights, labour, environment, health, safety, and anti-corruption. Suppliers shall adopt the UN Guiding Principles on Business and Human Rights (UNGPs)<sup>1</sup> in all their commercial activities related to the supply of goods or services to Salt.

## 12 Product Conformity

Supplier shall develop, manufacture, package and operate the supplied goods in compliance with the applicable laws and regulations relating to their technical conformity and safety.

# 2. Human Rights

<sup>&</sup>lt;sup>1</sup> https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr\_en.pdf

#### 2.1 Child Labour

Suppliers shall not employ child labour, as defined by the International Labour Organization (ILO) conventions n° 138 and 182° or local laws whichever is stricter.

#### 22 Forced Labour

Suppliers shall not use any form of forced or involuntary labour, including bonded labour or human trafficking.

#### 3. Labour Practices

# 3.1 Remuneration and Working Times

Salt expects fair remuneration and reasonable working times. Suppliers must observe all national legal provisions, binding geographical industry standards and applicable collective agreements with respect to working times and minimal wages. In the absence of national provisions, the international ILO standards<sup>3</sup> apply.

#### 32 Non-Discrimination

Suppliers must provide equal employment opportunities and must not discriminate against employees or job applicants on the basis of ethnic or cultural background, colour, religion, gender, sexual orientation, nationality, age, disability, or any other status protected by applicable laws.

#### 33 Freedom of Association

Suppliers shall respect the rights of employees to freely associate, form or join organisations of their choice, engage in collective bargaining, and participate in lawful strikes.

# 3.4 Health and Safety

Suppliers must provide a safe and healthy working environment for their employees. This includes compliance with all relevant health and safety laws and regulations, providing necessary training, and implementing measures to prevent accidents and injuries. Suppliers must have emergency plans and response procedures for their premises that include: (i) emergency preparedness, reporting and notification; (ii) evacuation procedures, training and drills; (iii) appropriate hazard detection and suppression equipment.

#### 35 No Harsh or Inhuman Treatments

Suppliers shall prohibit physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation.

<sup>&</sup>lt;sup>2</sup> https://www.ilo.org/international-programme-elimination-child-labour-ipec/what-child-labour/ilo-conventions-child-labour.%20These%20Conventions%20are/of%20Child%20Labour.%20These%20Conventions%20are%20%E2%80%9Cfundamental%E2%80%9D%20Conventions

<sup>3</sup> https://normlex.ilo.org/dyn/nrmlx\_en/f?p=NORMLEXPUB:12000:0::NO::P12000\_INSTRUMENT\_SORT:2

#### 3.6 Grievance Mechanism

Suppliers shall ensure a grievance mechanism compliant with the UNGPs is in place.

# 4. Environmental Responsibility

#### 4.1 Compliance

Suppliers must comply with all applicable environmental laws and regulations.

## 42 Sustainability

Salt encourages its suppliers to adopt environmentally responsible practices, such as assessing and reducing greenhouse gas and other harmful emissions, preventing pollution, managing and reducing waste, improving energy efficiency, and sourcing materials sustainably. Suppliers are also encouraged to take initiatives that enhance the environmental performance of the goods and services they provide—through their design, use, and disposal. Salt values and recognises such efforts as an important contribution to its own sustainability goals.

Where applicable and feasible, suppliers are invited to share information on their environmental progress with Salt. This may include a published annual ESG report or ad hoc reporting. Suppliers involved in the production of goods or services that contribute to Salt's CO<sub>2</sub> reporting are expected to provide relevant environmental data upon request, in order to support accurate and transparent emissions declarations. Suppliers are further expected to comply with any sustainability reporting obligations applicable in their country of operation.

## 5. Ethical Business Practices

# 5.1 Anti-Corruption

Suppliers must obey all relevant international and local laws regarding ethical business practices, in accordance with the OECD Anti-Bribery Convention<sup>4</sup> and demonstrate procedures to prevent fraud, bribery, corruption, money laundering or conflicts of interest or any other unethical business practices.

Suppliers must not offer any personal gifts, discounts, hospitality or other benefits – whether monetary or in-kind – to Salt employees when in a tender or negotiation process.

If suppliers wish to offer a gift, discount, hospitality or other benefit to an employee, they are required to first seek clarification on Salt's applicable rules and obtain prior approval from the appropriate Salt contact.

#### 52 Economic Sanctions

Suppliers shall inform Salt without delay if they or any of their group companies are listed, or added to a list, of economic sanctions in the US, the UK, the EU and/or Switzerland.

<sup>&</sup>lt;sup>4</sup> https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/fighting-foreign-bribery/Convention%20and%20commentaries%20booklet%202024.pdf

#### 5.3 Fair Competition

Suppliers shall compete fairly and ethically in accordance with all applicable antitrust and competition laws.

#### 54 Treatment of Conflict Resources

Suppliers shall take appropriate measures to prevent or reduce the risk of using raw materials sourced from conflict-affected or high-risk areas that may contribute to human rights abuses in their products.

# 6. Confidentiality, Data Protection and Intellectual Property

Suppliers are expected to respect the confidentiality of any information provided by Salt and to use or disclose such information only for purposes defined in their agreement with Salt. Confidential information must not be disclosed to third parties unless expressly authorized. Suppliers shall comply with all applicable laws and regulatory requirements related to privacy, data protection, and information security. In addition, they are required to adhere to Salt's contractual requirements related to privacy, data protection, and information security. Salt's information must be securely returned or destroyed when it is no longer necessary for fulfilling the supplier's obligations, or upon termination of the business relationship.

Suppliers must also respect intellectual property rights and take appropriate measures to protect any proprietary information shared by Salt.

# 7. Grievance Mechanism

Any misconduct or breach to this Supplier Code of Conduct can be addressed by sending an email to: whistleblowing@salt.ch or in writing to: Whistleblowing, Salt Mobile SA, Avenue de Malley 2, 1008 Prilly, Switzerland.

Salt's grievance channel is available to all employees who wish to report any potential breach of this Supplier Code of Conduct in a safe, confidential, and anonymous manner. Any reported concerns will be promptly investigated, with diligence and in a timely manner. Salt expects suppliers to have their own grievance mechanism in place, aligned with the UN Guiding Principles on Business and Human Rights.

# 8. Monitoring and Compliance

Salt reserves the right to monitor and assess supplier compliance with this Code of Conduct. Suppliers are expected to cooperate with any reasonable audits or assessments carried out by Salt or its authorized, particularly in cases where there is reason to suspect a breach of the Supplier Code of Conduct. Each Party (Salt and the supplier) shall bear its own costs associated with such audits or assessments. If an audit or assessment is initiated, Salt will provide the supplier with written notice within a reasonable timeframe in advance, outlining the intended scope. As a general principle, such audits or assessments will not occur more than once per calendar year and are expected to be conducted remotely, unless a physical audit is considered necessary and mutually agreed upon by both parties.

Before the audit or assessment takes place, the parties will engage in good faith discussions to agree on the scope, timing, and duration of the process, with the aim of ensuring minimal disruption to the supplier's business operations.

# 9. Consequences of Non-Compliance

In the event of non-compliance with this Code of Conduct, Salt will engage with the concerned supplier to identify appropriate remedies and encourage corrective action. The aim is to resolve the issue through cooperation and dialogue.

However, repeated breaches or a demonstrated unwillingness to collaborate may result in further measures, including the possible termination of the supplier relationship by Salt.

# 10. Review and Revision

This Code of Conduct will be periodically reviewed and updated as needed to ensure its continued relevance and effectiveness, considering feedback from relevant stakeholders. When appropriate, related internal procedures may also be adjusted to support and enhance the implementation of this Code of Conduct.